January 18, 2002

Mr. Tom Julian
Freudenberg-NOK General Partnership
P. O. Box 452
Scottsburg, Indiana 47170

Re: 143-15391
First Administrative Amendment to
Part 70 143-8936-00010

Dear Mr. Julian:

Freudenberg-NOK General Partnership was issued a Title V permit on February 21, 2001 for a stationary rubber and spring packed seals manufacturing plant. A letter requesting a change was received on January 10, 2002. The source proposes to use mold release RR-5 Hot EF-1 spray in the rubber molding operation, which will emit 7.05 tons of VOC per year (see the attached spreadsheet). Pursuant to the provisions of 2-7-11(a)(8), the change qualifies as a "revision in descriptive information where revision will not trigger a new applicable requirement or violate a permit term", since the VOC emission is less than the Minor Source Modification threshold of 10 tons per year. However, amendment to the permit is not necessary because of the following:

Section A.3 Specifically Regulated Insignificant Activities - Since there are no currently regulated insignificant activities and the proposed use of mold release RR-5 Hot EF-1 spray in the rubber molding operation is not specifically regulated, Section A.3 will remain blank.

No other sections in the permit will be affected by the use of mold release RR-5 Hot EF-1 spray in the rubber molding operation.

All conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman, at (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Original signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

APD
cc: File - Scott County
U.S. EPA, Region V
Scott County Health Department
Air Compliance Section Inspector - Joe Foyst
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Freudenberg-NOK General Partnership
Address City IN Zip: 821 Lake Rd., Scottsburg, IN 47170
Administrative Amendment: 143-15391
Plt ID: 143-00010
Reviewer: Aida De Guzman
Date Application Received: January 10, 2002

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/lb)	Maximum (lb/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Mold Release (RR-5 Hot, EF-1)	6.9	99.00%	0.0%	99.0%	0.0%	1.00%	0.00026	913.240	6.78	6.78	1.61	38.65	7.05	0.02	678.15	75%
State Potential Emissions			**Add worst case coating to all solvents**								**1.61**	**38.65**	**7.05**	**0.02**		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used